



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 27, 2020

VIA ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 7/27/2020

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government respectfully submits this letter to request the opportunity to respond to defense counsel's letter motion seeking the entry of a protective order, which was filed this morning. The Government and defense counsel were in discussions – as recently as 6 p.m. last night – in the hopes of jointly proposing a protective order. Until seeing the filing on ECF this morning, the Government had understood those discussions to be ongoing. In light of the defense's letter, however, the Government respectfully requests until 5 p.m. tomorrow to submit a response.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s

Alex Rossmiller / Alison Moe / Maurene Comey
Assistant United States Attorneys
Southern District of New York
Tel: (212) 637-2324

Cc: All counsel of record (by ECF)

The Government's response to the Defense's letter is due by 5 p.m. on July 28, 2020. The Defense may file a reply by 5 p.m. on July 29, 2020. Before the Government's response is filed, the parties must meet and confer by phone regarding this issue, and any response from the Government must contain an affirmation that the parties have done so.
SO ORDERED.

SO ORDERED. 7/27/20

Alison J. Nathan, U.S.D.J.